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Attorney for Debtor

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

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In Re: : Chapter 13  
Barry Wallace, : Case No. 16-17471 (ABA)  
Debtor(s). :  
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**OBJECTION TO CERTIFICATION OF DEFAULT**

Barry Wallace, hereby certifies and says:

1. I am the debtor in the above-captioned Chapter 13 bankruptcy.
2. The within Chapter 13 bankruptcy proceeding was filed on April 18, 2016.
3. On or about November 10, 2016 I entered into a consent to resolve post petition arrears on a 2015 Toyota Highlander.
4. To date I have made significant payments required under the consent order entered in this matter.
5. I object to the Toyota Motor Credit Corporation's Certification of Default of the within bankruptcy proceeding, and requests a payoff from creditor in light of the above agreement between Toyota Motor Credit Corporation and I, and respectfully request this Court to allow the bankruptcy an the automatic stay to continue.

I certify that the foregoing statements made by me are true. I am aware that if any of the

foregoing statements made by me are willfully false, I am subject to punishment.



/s/ Barry Wallace  
Barry Wallace

Date: February 20, 2020